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FILED  
U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA BY                      DEPUTY

v.

MARQUIS MOORE,  
MILEK RANKIN, and  
DONTRELL GLOVER,

Defendants.

CRIMINAL NO. RDB-19-0418

(Conspiracy to Interfere with Commerce  
by Robbery, 18 U.S.C. § 1951(a);  
Conspiracy to Use, Carry, and Brandish a  
Firearm During and in Relation to Crimes  
of Violence, 18 U.S.C. § 924(o);  
Interference with Commerce by Robbery,  
18 U.S.C. § 1951(a); Using, Carrying, and  
Brandishing a Firearm During and in  
Relation to a Crime of Violence, 18 U.S.C.  
§ 924(c); Aiding and Abetting, 18 U.S.C.  
§ 2; Forfeiture, 18 U.S.C. § 924(d) and 28  
U.S.C. § 2461(c))

**INDICTMENT**

**COUNT ONE**

**(Conspiracy to Interfere with Commerce by Robbery)**

The Grand Jury for the District of Maryland charges that:

From a time unknown to the Grand Jury, but no later than in or about October 2018, and  
continuing through March 1, 2019, in the District of Maryland, the defendants,

**MARQUIS MOORE,  
MILEK RANKIN, and  
DONTRELL GLOVER**

did knowingly combine, conspire, confederate, and agree with persons, known and unknown to  
the Grand Jury, to knowingly and intentionally obstruct, delay and affect, and attempt to obstruct,  
delay and affect, commerce as that term is defined in 18 U.S.C. § 1951, and the movement of

articles and commodities in such commerce, by robbery as that term is defined in 18 U.S.C. § 1951, in that the defendants conspired to unlawfully take U.S. currency and other items from the person or presence of victims, against the victims' will by means of actual and threatened force, violence, fear of injury, immediate and future, to their persons and property.

### **OBJECT OF THE CONSPIRACY**

1. The object of the charged defendants was to obtain money and other commodities from fast-food restaurants, video game stores, cell-phone stores, shoe stores, and dollar stores by robbery.

### **MANNER AND MEANS OF THE CONSPIRACY**

2. It was part of the conspiracy that MOORE, RANKIN, and GLOVER planned to and did rob businesses in Maryland, including in Baltimore City, Baltimore County, and Anne Arundel County, Maryland.

3. It was further part of the conspiracy that MOORE and RANKIN would enter the stores wearing masks over their faces and MOORE would brandish a firearm.

4. It was further part of the conspiracy that MOORE and RANKIN would demand cash and other commodities from store employees while MOORE would brandish the firearm.

5. It was further part of the conspiracy that GLOVER would drive MOORE and RANKIN away from the robberies in a black Toyota Camry registered to GLOVER.

6. It was further part of the conspiracy that MOORE, RANKIN, and GLOVER would enrich themselves and share the proceeds from the robberies.

### **OVERT ACTS**

7. In furtherance of the conspiracy, and to effect the objects thereof, the defendants participated in and committed the following acts, among others, in the District of Maryland:

a. On or about November 20, 2018, MOORE and RANKIN entered the Shoe City store located at 3418 Annapolis Road, Baltimore, Maryland 21227 ("Shoe City"), brandished a firearm, and removed shoes and U.S. currency from Shoe City in the presence of employees of the business;

b. On or about January 4, 2019, MOORE and RANKIN entered the Boost Mobile store located at 1223 Eastern Boulevard, Essex 21221 ("Boost Mobile"), brandished a firearm, struck a Boost Mobile employee with the firearm, and removed U.S. currency from Boost Mobile in the presence of an employee of the business;

c. On or about January 11, 2019, MOORE and RANKIN entered the Metro PCS store located at 7553 Ritchie Highway, Glen Burnie, Maryland 21061 ("Metro PCS 1"), brandished a firearm, and removed U.S. currency from Metro PCS 1 in the presence of employees of the business;

d. On or about January 11, 2019, GLOVER arrived at or near Metro PCS 1 in a vehicle and MOORE and RANKIN entered the vehicle immediately after the robbery and the three fled the scene;

e. On or about January 11, 2019, MOORE and RANKIN entered the Family Dollar store located at 4301 Annapolis Road, Halethorpe, Maryland 21227 ("Family Dollar"), brandished a firearm, and removed U.S. currency from Family Dollar in the presence of employees of the business;

f. On or about January 11, 2019, GLOVER was at or near Family Dollar in a vehicle and MOORE and RANKIN entered the vehicle immediately after the robbery and the three fled the scene;

g. On or about January 27, 2019, MOORE and RANKIN entered the McDonald's



restaurant located at 3920 Falls Road, Baltimore, Maryland 21211 ("McDonald's 1"), brandished a firearm, and removed U.S. currency from McDonald's 1 in the presence of employees of the business;

h. On or about January 27, 2019, GLOVER was at or near McDonald's 1 in a vehicle and MOORE and RANKIN entered the vehicle immediately after the robbery and the three fled the scene.

i. On or about February 4, 2019, MOORE and RANKIN entered the GameStop store located at 7300 Ritchey Highway, Unit 102, Glen Burnie, Maryland 21061 ("GameStop"), brandished a firearm, and removed U.S. currency and two Nintendo Switches from GameStop in the presence of employees of the business;

j. On or about February 4, 2019, GLOVER was at or near GameStop in a vehicle and MOORE and RANKIN entered the vehicle immediately after the robbery and the three fled the scene;

k. On or about February 11, 2019, MOORE and RANKIN entered the Metro PCS store located at 8209 Liberty Road, Windsor Mill, Maryland 21244 ("Metro PCS 2"), brandished a firearm, and removed U.S. currency from Metro PCS 2 in the presence of employees of the business;

l. On or about February 11, 2019, GLOVER arrived at or near Metro PCS 2 in a vehicle and MOORE and RANKIN entered the vehicle immediately after the robbery and the three fled the scene;

m. On or about February 11, 2019, MOORE and RANKIN entered the Cricket Wireless store located at 8229 Liberty Road, Windsor Mill, Maryland 21244 ("Cricket Wireless"), brandished a firearm, and removed U.S. currency from Cricket Wireless in the

presence of employees of the business;

n. On or about February 11, 2019, GLOVER arrived at or near Cricket Wireless in a vehicle and MOORE and RANKIN entered the vehicle immediately after the robbery and the three fled the scene;

o. On or about February 26, 2019, MOORE and RANKIN entered the McDonald's restaurant located at 2107 East Joppa Road, Parkville, Maryland 21234 ("McDonald's 2"), brandished a firearm, and removed U.S. currency from McDonald's 2 in the presence of employees of the business;

p. On or about February 26, 2019, GLOVER was at or near McDonald's 2 in a vehicle and MOORE and RANKIN entered the vehicle immediately after the robbery and the three fled the scene;

q. On or about March 1, 2019, MOORE and RANKIN entered the McDonald's restaurant located at 6005 Liberty Road, Baltimore, Maryland 21207 ("McDonald's 3"), brandished a firearm, and removed U.S. currency from McDonald's 3 in the presence of employees of the business;

r. On or about March 1, 2019, GLOVER was at or near McDonald's 3 in a vehicle and MOORE and RANKIN entered the vehicle immediately after the robbery and the three fled the scene;

s. During the course of the conspiracy, MOORE and RANKIN entered numerous other commercial businesses in Anne Arundel County, Baltimore County, and Baltimore City, Maryland, brandished a firearm, and removed U.S. currency and other items, affecting interstate commerce. During some of these robberies, GLOVER was at or near the commercial businesses in a vehicle and drove MOORE and RANKIN from the

locations after the robberies.

18 U.S.C. § 1951(a)

18 U.S.C. § 2

**COUNT TWO**  
**(Conspiracy to Use, Carry, and Brandish a Firearm  
During and in Relation to Crimes of Violence)**

The Grand Jury for the District of Maryland further charges that:

From a time unknown to the Grand Jury, but no later than in or about November 2018, and continuing through March 1, 2019, in the District of Maryland and elsewhere, the defendants,

**MARQUIS MOORE,  
MILEK RANKIN, and  
DONTRELL GLOVER**

did knowingly and unlawfully combine, conspire, confederate and agree with each other and other persons, known and unknown to the Grand Jury, to knowingly use, carry, and brandish a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, Interference with Commerce by Robbery, as set forth in Counts 3, 5, 7, 9, 11, 13, 15, 19, and 21 of this Indictment, which are incorporated herein by reference.

18 U.S.C. § 924(o)

**COUNT THREE**  
**(Interference with Commerce by Robbery)**

The Grand Jury for the District of Maryland further charges that:

1. At all times material to this Indictment, the Shoe City store located at 3418 Annapolis Road, Baltimore, Maryland 21227 (“Shoe City”) was engaged in the retail sale of shoes and other consumer products in interstate commerce and the business of the Shoe City affected interstate commerce.

2. On or about November 20, 2018, in the District of Maryland, the defendants,

**MARQUIS MOORE and**  
**MILEK RANKIN**

did knowingly, obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the defendants did unlawfully take and obtain money and property belonging to Shoe City from the person of and in the presence of an employee of Shoe City, against the employee’s will by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employee’s person and property in the employee’s custody and possession.

18 U.S.C. § 1951(a)  
18 U.S.C. § 2



**COUNT FOUR**  
**(Using, Carrying, and Brandishing a Firearm  
During and in Relation to a Crime of Violence)**

The Grand Jury for the District of Maryland further charges that:

On or about November 20, 2018, in the District of Maryland, the defendants,

**MARQUIS MOORE and  
MILEK RANKIN**

did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, Interference with Commerce by Robbery in violation of Title 18, United States Code, Section 1951, as alleged in Count Three of this Indictment.

18 U.S.C. § 924(c)  
18 U.S.C. § 2

**COUNT FIVE**  
**(Interference with Commerce by Robbery)**

The Grand Jury for the District of Maryland further charges that:

1. At all times material to this Indictment, the Boost Mobile store located at 1223 Eastern Boulevard, Essex, Maryland 21221 (“Boost Mobile”) was engaged in the retail sale of cell phones and other consumer products in interstate commerce and the business of Boost Mobile affected interstate commerce.

2. On or about January 4, 2019, in the District of Maryland, the defendants,

**MARQUIS MOORE,  
MILEK RANKIN, and  
DONTRELL GLOVER**

did knowingly, obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the defendants did unlawfully take and obtain money and property belonging to Boost Mobile from the person of and in the presence of an employee of Boost Mobile, against the employee’s will by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employee’s person and property in the employee’s custody and possession.

18 U.S.C. § 1951(a)  
18 U.S.C. § 2

**COUNT SIX**  
**(Using, Carrying, and Brandishing a Firearm  
During and in Relation to a Crime of Violence)**

The Grand Jury for the District of Maryland further charges that:

On or about January 4, 2019, in the District of Maryland, the defendants,

**MARQUIS MOORE,  
MILEK RANKIN, and  
DONTRELL GLOVER**

did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, Interference with Commerce by Robbery in violation of Title 18, United States Code, Section 1951, as alleged in Count Five of this Indictment.

18 U.S.C. § 924(c)

18 U.S.C. § 2

**COUNT SEVEN**  
**(Interference with Commerce by Robbery)**

The Grand Jury for the District of Maryland further charges that:

1. At all times material to this Indictment, the Metro PCS store located at 7553 Ritchie Highway, Glen Burnie, Maryland 21061 (“Metro PCS 1”) was engaged in the retail sale of cell phones and other consumer products in interstate commerce and the business of Metro PCS 1 affected interstate commerce.

2. On or about January 11, 2019, in the District of Maryland, the defendants,

**MARQUIS MOORE,  
MILEK RANKIN, and  
DONTRELL GLOVER**

did knowingly, obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the defendants did unlawfully take and obtain money and property belonging to Metro PCS 1 from the person of and in the presence of an employee of Metro PCS 1, against the employee’s will by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employee’s person and property in the employee’s custody and possession.

18 U.S.C. § 1951(a)

18 U.S.C. § 2



**COUNT EIGHT**  
**(Using, Carrying, and Brandishing a Firearm  
During and in Relation to a Crime of Violence)**

The Grand Jury for the District of Maryland further charges that:

On or about January 11, 2019, in the District of Maryland, the defendants,

**MARQUIS MOORE,  
MILEK RANKIN, and  
DONTRELL GLOVER**

did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, Interference with Commerce by Robbery in violation of Title 18, United States Code, Section 1951, as alleged in Count Seven of this Indictment.

18 U.S.C. § 924(c)

18 U.S.C. § 2

**COUNT NINE**  
**(Interference with Commerce by Robbery)**

The Grand Jury for the District of Maryland further charges that:

1. At all times material to this Indictment, the Family Dollar store located at 4301 Annapolis Road, Halethorpe, Maryland 21227 ("Family Dollar") was engaged in the retail sale of consumer products in interstate commerce and the business of Family Dollar affected interstate commerce.

2. On or about January 11, 2019, in the District of Maryland, the defendants,

**MARQUIS MOORE,  
MILEK RANKIN, and  
DONTRELL GLOVER**

did knowingly, obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the defendants did unlawfully take and obtain money and property belonging to Family Dollar from the person of and in the presence of an employee of Family Dollar, against the employee's will by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employee's person and property in the employee's custody and possession.

18 U.S.C. § 1951(a)

18 U.S.C. § 2

**COUNT TEN**  
**(Using, Carrying, and Brandishing a Firearm  
During and in Relation to a Crime of Violence)**

The Grand Jury for the District of Maryland further charges that:

On or about January 11, 2019, in the District of Maryland, the defendants,

**MARQUIS MOORE,  
MILEK RANKIN, and  
DONTRELL GLOVER**

did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, Interference with Commerce by Robbery in violation of Title 18, United States Code, Section 1951, as alleged in Count Nine of this Indictment.

18 U.S.C. § 924(c)  
18 U.S.C. § 2

**COUNT ELEVEN**  
**(Interference with Commerce by Robbery)**

The Grand Jury for the District of Maryland further charges that:

1. At all times material to this Indictment, the McDonald's restaurant located at 3920 Falls Road, Baltimore, Maryland 21211 ("McDonald's 1") was engaged in the sale of foods and other consumer products in interstate commerce and the business of McDonald's 1 affected interstate commerce.

2. On or about January 27, 2019, in the District of Maryland, the defendants,

**MARQUIS MOORE,  
MILEK RANKIN, and  
DONTRELL GLOVER**

did knowingly, obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the defendants did unlawfully take and obtain money and property belonging to McDonald's 1 from the person of and in the presence of an employee of McDonald's 1, against the employee's will by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employee's person and property in the employee's custody and possession.

18 U.S.C. § 1951(a)

18 U.S.C. § 2



**COUNT TWELVE**  
**(Using, Carrying, and Brandishing a Firearm  
During and in Relation to a Crime of Violence)**

The Grand Jury for the District of Maryland further charges that:

On or about January 27, 2019, in the District of Maryland, the defendants,

**MARQUIS MOORE,  
MILEK RANKIN, and  
DONTRELL GLOVER**

did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, Interference with Commerce by Robbery in violation of Title 18, United States Code, Section 1951, as alleged in Count Eleven of this Indictment.

18 U.S.C. § 924(c)

18 U.S.C. § 2

**COUNT THIRTEEN**  
**(Interference with Commerce by Robbery)**

The Grand Jury for the District of Maryland further charges that:

1. At all times material to this Indictment, the GameStop store located at 7300 Ritchey Highway, Unit 102, Glen Burnie, Maryland 21061 (“GameStop”) was engaged in the retail sale of video games and other consumer products in interstate commerce and the business of GameStop affected interstate commerce.

2. On or about February 4, 2019, in the District of Maryland, the defendants,

**MARQUIS MOORE,  
MILEK RANKIN, and  
DONTRELL GLOVER**

did knowingly, obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the defendants did unlawfully take and obtain money and property belonging to GameStop from the person of and in the presence of an employee of GameStop, against the employee’s will by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employee’s person and property in the employee’s custody and possession.

18 U.S.C. § 1951(a)  
18 U.S.C. § 2

**COUNT FOURTEEN**  
**(Using, Carrying, and Brandishing a Firearm  
During and in Relation to a Crime of Violence)**

The Grand Jury for the District of Maryland further charges that:

On or about February 4, 2019, in the District of Maryland, the defendants,

**MARQUIS MOORE,  
MILEK RANKIN, and  
DONTRELL GLOVER**

did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, Interference with Commerce by Robbery in violation of Title 18, United States Code, Section 1951, as alleged in Count Thirteen of this Indictment.

18 U.S.C. § 924(c)

18 U.S.C. § 2

**COUNT FIFTEEN**  
**(Interference with Commerce by Robbery)**

The Grand Jury for the District of Maryland further charges that:

1. At all times material to this Indictment, the Metro PCS store located at 8209 Liberty Road, Windsor Mill, Maryland 21244 ("Metro PCS 2") was engaged in the retail sale of cell phones and other consumer products in interstate commerce and the business of Metro PCS 2 affected interstate commerce.

2. On or about February 11, 2019, in the District of Maryland, the defendants,

**MARQUIS MOORE,  
MILEK RANKIN, and  
DONTRELL GLOVER**

did knowingly, obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the defendants did unlawfully take and obtain money and property belonging to Metro PCS 2 from the person of and in the presence of an employee of Metro PCS 2, against the employee's will by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employee's person and property in the employee's custody and possession.

18 U.S.C. § 1951(a)

18 U.S.C. § 2



**COUNT SIXTEEN**  
**(Using, Carrying, and Brandishing a Firearm  
During and in Relation to a Crime of Violence)**

The Grand Jury for the District of Maryland further charges that:

On or about February 11, 2019, in the District of Maryland, the defendants,

**MARQUIS MOORE,  
MILEK RANKIN, and  
DONTRELL GLOVER**

did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, Interference with Commerce by Robbery in violation of Title 18, United States Code, Section 1951, as alleged in Count Fifteen of this Indictment.

18 U.S.C. § 924(c)

18 U.S.C. § 2

**COUNT SEVENTEEN**  
**(Interference with Commerce by Robbery)**

The Grand Jury for the District of Maryland charges that:

1. At all times material to this Indictment, the Cricket Wireless store located at 8229 Liberty Road, Windsor Mill, Maryland 21244 (“Cricket Wireless”) was engaged in the retail sale of cell phones and other consumer products in interstate commerce and the business of Cricket Wireless affected interstate commerce.

2. On or about February 11, 2019, in the District of Maryland, the defendants,

**MARQUIS MOORE,  
MILEK RANKIN, and  
DONTRELL GLOVER**

did knowingly, obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the defendants did unlawfully take and obtain money and property belonging to Cricket Wireless from the person of and in the presence of an employee of Cricket Wireless, against the employee’s will by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employee’s person and property in the employee’s custody and possession.

18 U.S.C. § 1951(a)

18 U.S.C. § 2

**COUNT EIGHTEEN**  
**(Using, Carrying, and Brandishing a Firearm  
During and in Relation to a Crime of Violence)**

The Grand Jury for the District of Maryland further charges that:

On or about February 11, 2019, in the District of Maryland, the defendants,

**MARQUIS MOORE,  
MILEK RANKIN, and  
DONTRELL GLOVER**

did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, Interference with Commerce by Robbery in violation of Title 18, United States Code, Section 1951, as alleged in Count Seventeen of this Indictment.

18 U.S.C. § 924(c)

18 U.S.C. § 2

**COUNT NINETEEN**  
**(Interference with Commerce by Robbery)**

The Grand Jury for the District of Maryland further charges that:

1. At all times material to this Indictment, the McDonald's restaurant located at 2107 East Joppa Road, Parkville, Maryland 21234 ("McDonald's 2") was engaged in the sale of foods and other consumer products in interstate commerce and the business of the McDonald's 2 affected interstate commerce.

2. On or about February 26, 2019, in the District of Maryland, the defendants,

**MARQUIS MOORE,  
MILEK RANKIN, and  
DONTRELL GLOVER**

did knowingly, obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the defendants did unlawfully take and obtain money and property belonging to McDonald's 2 from the person of and in the presence of an employee of McDonald's 2, against the employee's will by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employee's person and property in the employee's custody and possession.

18 U.S.C. § 1951(a)  
18 U.S.C. § 2



**COUNT TWENTY**  
**(Using, Carrying, and Brandishing a Firearm  
During and in Relation to a Crime of Violence)**

The Grand Jury for the District of Maryland further charges that:

On or about February 26, 2019, in the District of Maryland, the defendants,

**MARQUIS MOORE,  
MILEK RANKIN, and  
DONTRELL GLOVER**

did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, Interference with Commerce by Robbery in violation of Title 18, United States Code, Section 1951, as alleged in Count Nineteen of this Indictment.

18 U.S.C. § 924(c)

18 U.S.C. § 2

**COUNT TWENTY-ONE**  
**(Interference with Commerce by Robbery)**

The Grand Jury for the District of Maryland further charges that:

3. At all times material to this Indictment, the McDonald's restaurant located at 6005 Liberty Road, Baltimore, Maryland 21207 ("McDonald's 3") was engaged in the sale of food and other consumer products in interstate commerce and the business of McDonald's 3 affected interstate commerce.

4. On or about March 1, 2019, in the District of Maryland, the defendants,

**MARQUIS MOORE,  
MILEK RANKIN, and  
DONTRELL GLOVER**

did knowingly, obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the defendants did unlawfully take and obtain money and property belonging to McDonald's 3 from the person of and in the presence of an employee of McDonald's 3, against the employee's will by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employee's person and property in the employee's custody and possession.

18 U.S.C. § 1951(a)  
18 U.S.C. § 2

**COUNT TWENTY-TWO**  
**(Using, Carrying, and Brandishing a Firearm**  
**During and in Relation to a Crime of Violence)**

The Grand Jury for the District of Maryland further charges that:

On or about March 1, 2019, in the District of Maryland, the defendants,

**MARQUIS MOORE,**  
**MILEK RANKIN, and**  
**DONTRELL GLOVER**

did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, Interference with Commerce by Robbery in violation of Title 18, United States Code, Section 1951, as alleged in Count Twenty-One of this Indictment.

18 U.S.C. § 924(c)

18 U.S.C. § 2

**FORFEITURE**

The Grand Jury for the District of Maryland further charges that:

1. Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), as a result of the defendants' conviction under Counts Four, Six, Eight, Ten, Twelve, Fourteen, Sixteen, Eighteen, Twenty, and Twenty-Two of the Indictment.

2. As a result of the defendants' conviction under Counts Four, Six, Eight, Ten, Twelve, Fourteen, Sixteen, Eighteen, Twenty, and Twenty-Two of the Indictment, the defendants,

**MARQUIS MOORE,  
MILEK RANKIN, and  
DONTRELL GLOVER**

shall forfeit to the United States any firearms involved or used in such offenses.

18 U.S.C. § 924(d)  
28 U.S.C. § 2461(c)  
Fed. R. Crim. P. 32.2(a)

  
ROBERT K. HUR  
UNITED STATES ATTORNEY

A TRUE BILL:

**SIGNATURE REDACTED**

FOREPERSON

8/29/19

DATE